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August 25, 2021

Via ECF

Hon. Gregory Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Room 2260
New York, NY 10007-1312

Re: *Application of Alberto Safra for an Order to take Discovery for use in foreign proceedings pursuant to 28 U.S.C. 1782, 1:21-mc-00640-GHW*

Dear Judge Woods:

We represent Petitioner Alberto Safra in the above-captioned proceeding. We write to clarify Petitioner's basis for filing the redacted 1782 Application on the public docket in this case.

On July 27, 2021, Petitioner moved to seal certain portions of the 1782 Application. *See Safra*, 21-mc-00596-ALC (S.D.N.Y.). On July 30, 2021, Judge Andrew L. Carter granted Petitioner's request to redact certain portions of his proposed 1782 Application. *See* Exhibit 1 (July 30, 2021 Order).

On August 5, 2021, Petitioner filed his Section 1782 Application in both redacted and unredacted form. In accordance with ECF Rule 6.14, Petitioner filed by hand the unredacted version of the 1782 Application with the Clerk of the Court at 500 Pearl St. New York, NY. *See* Exhibit 2 (image of sealing envelope listing filed contents, including the unredacted papers and Judge Carter's July 30 Order).¹ On the same day, Petitioner electronically filed the redacted version of his 1782 Application via ECF. Petitioner respectfully requests that this Court maintain the redactions authorized by Judge Carter.

¹ However, it appears that the unredacted filings and Judge Carter's July 30 Order were not transferred over to the Court.

Petitioner also requests the Court's permission to email the unredacted 1782 Application to Your Honor's chambers email address so that Your Honor has immediate access to those copies. In that email, we also propose to include Petitioner's motion to seal the 1782 Application together with Judge Carter's July 30 Order. If Your Honor requires courtesy copies of any of these documents, we will arrange for these to be delivered to Your Honor upon request.²

We thank the Court for its attention to this matter and remain available to provide any further clarification.

Respectfully submitted,

/s/ Michael Carlinsky

Michael Carlinsky

² We have not done so in light of Rule 1.A of Your Honor's Emergency Individual Rules And Practices In Light Of Covid-19.